

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

RODERICK NAPOLEON HARRIS,	§	
Petitioner,	§	
	§	
v.	§	CIV. NO. 3:20-cv-03702-E
	§	*DEATH PENALTY CASE*
BOBBY LUMPKIN,	§	
Director, Texas Department of	§	
Criminal Justice, Correctional	§	
Institutions Division,	§	
Respondent.	§	

**RESPONDENT'S MOTION TO SUBSTITUTE COUNSEL  
FOR THE DIRECTOR WITH BRIEF IN SUPPORT**

This is a federal habeas corpus proceeding initiated by Petitioner Roderick Harris, a death-sentenced Texas inmate, pursuant to 28 U.S.C. § 2254. Lead counsel, former Assistant Attorney General Willa Cockshutt, is no longer with the Office of the Attorney General for Texas, and this case has been reassigned to the undersigned counsel. Accordingly, the Director respectfully requests that Willa Cockshutt be withdrawn and removed as counsel of record for Bobby Lumpkin, Director of TDCJ-CID, and Assistant Attorney General Molly Knowles be substituted thereof. All future correspondence should be sent to the same address at the undersigned's attention.

Respectfully submitted,

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

JOSH RENO  
Deputy Attorney General  
for Criminal Justice

EDWARD L. MARSHALL  
Assistant Attorney General  
Chief, Criminal Appeals Division

/s/ Molly Knowles  
MOLLY KNOWLES\*  
Assistant Attorney General  
State Bar No. 24122954

\*Lead Attorney

P.O. Box 12548, Capitol Station  
Austin, Texas 78711  
(512) 936-1400  
Facsimile No. (512) 936-1280  
Molly.knowles@oag.texas.gov

ATTORNEYS FOR RESPONDENT

### **CERTIFICATE OF CONFERENCE**

The Director has conferred with Harris through his counsel of record, and he does not oppose this substitution.

s/ Molly M. Knowles  
MOLLY M. KNOWLES  
Assistant Attorney General

### **CERTIFICATE OF SERVICE**

I hereby certify that I have electronically filed the foregoing on November 8, 2023, with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following.

Michael Mowla  
Michael Mowla PLLC  
PO Box 868  
Cedar Hill, TX 75106  
Email: michael@mowlalaw.com

s/ Molly M. Knowles  
MOLLY M. KNOWLES  
Assistant Attorney General